UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA Richmond Division

MICHELLE BOURDELAIS, on behalf of herself and on behalf of all others similarly situated,

Plaintiff,

v. Civil Action No. 3:10cv670

JPMORGAN CHASE BANK, N.A. and CHASE HOME FINANCE, LLC,

Defendant.

PLAINTIFF'S MOTION FOR AN EXTENSION OF TIME TO RESPOND TO DEFENDANTS' MOTION TO DISMISS COUNTS ONE, FIVE AND SIX

COMES NOW the Plaintiff, with the consent of the Defendants, and pursuant to Fed. R. Civ. P. 6(b), moves the Court for an extension of time within which to respond to the Defendants' Motion to Dismiss (Docket No. 50), which is currently due on September 19, 2012. The parties have agreed, and the Plaintiff respectfully requests, that the time to respond be extended to October 3, 2012. The Plaintiff has agreed to extend the time in which the Defendant has to reply to be October 17, 2012.

This motion is made in good faith by consent and not for a dilatory purpose. The time to respond to the Motion to Dismiss has not yet expired and no party will be prejudiced as a result of an extension, which will serve justice. An Agreed Order is being circulated for original signature to be filed with the court forthwith. For these reasons, the Plaintiff respectfully requests the extension herein.

Respectfully submitted,

MICHELLE BOURDELAIS,

Susan M. Rotkis VSB #40693 Leonard A. Bennett VSB #37523 Attorney for Plaintiff **CONSUMER LITIGATION** ASSOCIATES, P.C. 763 J. Clyde Morris Blvd Suite 1A Newport News, Virginia 23601 (757) 930-3660 - Telephone (757) 930-3662 – Facsimile srotkis@clalegal.com

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of September, 2012, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

David Neal Anthony Troutman Sanders LLP Troutman Sanders Bldg 1001 Haxall Point PO Box 1122 Richmond, VA 23218-1122

E-mail: david.anthony@troutmansanders.com

 $/_{\rm S}/$

Susan M. Rotkis VSB #40693 Attorney for Plaintiff **CONSUMER LITIGATION** ASSOCIATES, P.C. 763 J. Clyde Morris Blvd Suite 1-A Newport News, Virginia 23601 (757) 930-3660 - Telephone (757) 930-3662 - Facsimile srotkis@clalegal.com